

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

WILLIAM ELLIOTT ASHFORD,

Plaintiff,

Case No.: 20-cv-10561

v.

Hon. Terrence G. Berg  
Mag. Judge Elizabeth A. Stafford

UNIVERSITY OF MICHIGAN,  
UNIVERSITY OF MICHIGAN-DEARBORN,  
GARY GORSKI, sued in his personal capacity,  
JEFFREY EVANS, sued in his personal capacity,  
DAVID HAWKINS, sued in his official capacity,  
BRYAN DADEY, sued in his official capacity,  
jointly and severally,

Defendants.

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**DEFENDANTS' OBJECTIONS TO  
PLAINTIFF'S "PROPOSED ORDER OF JUDGMENT FOR THE  
PLAINTIFF: JURY VERDICT"**

Defendants, The University of Michigan, University of Michigan-Dearborn,  
Gary Gorski (in his individual capacity), Jeffrey Evans (in his individual capacity),

David Hawkins (in his official capacity), and Bryan Dadey (in his official capacity) (collectively “Defendants”), through their counsel, Miller, Canfield, Paddock and Stone, PLC, submit the following objections to Plaintiff’s “Proposed Order of Judgment For The Plaintiff: Jury Verdict.”<sup>1</sup> Defendants make these objections without waiving their ability to appeal any aspect of this case, including any judgment.

Plaintiff’s proposed judgment is inconsistent with the jury verdict on the claims pled. Most critically, it seeks to have the Court enter a judgment against all Defendants in the same amount. The jury verdict includes specific damages assessed against each Defendant for different claims and any final judgment should accurately reflect that verdict.

Additionally, the proposed judgment is premature because Plaintiff has filed a Motion for Prospective Injunctive, Equitable, and Declaratory Relief. Defendants’ response to that motion is not due until June 13, 2024. E.D. Mich. L.R. 7.1(e)(2). Unless Plaintiff is abandoning his claim for equitable relief, entry of a final judgment should be deferred until that motion is resolved.

Finally, Defendants object to any reference “to any applicable costs, fees and interest as provided by law” because it is unclear what costs, fees, and interest, if

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<sup>1</sup> On May 29, 2024, Plaintiff submitted the proposed judgment prior to any attempt to meet and confer. Defendants submit these objections to preserve their rights since the proposed judgment is inconsistent with the Jury Verdict.

any, Plaintiff is seeking.

Dated: May 30, 2024

Respectfully submitted,

/s/Brian M. Schwartz (P69018)  
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**CERTIFICATE OF SERVICE**

I hereby certify that May 30, 2024, I electronically filed the foregoing paper with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys of record.

/s/ Brian M. Schwartz  
Brian M. Schwartz (P69018)